

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-116-GMS
	:	
DENNIS CARSON,	:	
	:	
Defendant.	:	

**MOTION FOR CONTINUANCE OF SENTENCING**

Defendant, Dennis Carson, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court for an Order continuing the sentencing hearing in this case. In support of the motion, the defense submits as follows:

1. Mr. Carson is currently scheduled for sentencing on October 11, 2007 at 11:30 a.m.
2. Defense counsel requires additional time to prepare for sentencing. Mr. Carson has significant mental health issues. Defense counsel has had Mr. Carson evaluated by Dr. Gary Glass, a psychiatrist, in order to gain an understanding of Mr. Carson's mental health issues, how these issues may have contributed to Mr. Carson's conduct in this case, and how Mr. Carson's mental health may affect sentencing. Defense counsel believes that obtaining a thorough evaluation from Dr. Glass concerning Mr. Carson's mental health, will also assist the Court in fashioning the appropriate sentence in this case. In order to properly complete his report, Dr. Glass is in need of Mr. Carson's prior mental health records, including his past mental health hospitalizations. Defense counsel is in the process of securing this information for Dr. Glass, but does not anticipate having it by the date

of sentencing, or in enough time to allow Dr. Glass to complete his report with sufficient time for the government and the Court to review it.

3. Defense counsel respectfully requests that Mr. Carson's sentencing be continued for 30 days to allow defense counsel time to adequately prepare for sentencing.

4. AUSA Dave Hall, the attorney handling this case for the government, has no objection to the defense's continuance request.

WHEREFORE, Mr. Carson respectfully requests that the Court continue the sentencing hearing in this matter to anytime after November 15, 2007.<sup>1</sup>

Respectfully Submitted,

/s/  
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Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
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Attorney for Defendant Dennis Carson

DATED: October 1, 2007

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<sup>1</sup>Defense counsel will be out of the office from November 7, 2007 through November 14, 2007. Defense counsel also has a trial scheduled to start in another matter on November 19, 2007 that is scheduled to last 3 days.

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DENNIS CARSON,	:	
	:	
Defendant.	:	

**ORDER**

In response to Mr. Carson's Motion for Continuance of Sentencing, this Court HEREBY  
ORDERS on this \_\_\_\_\_ day of \_\_\_\_\_, 2007, that Defendant's sentencing  
hearing be re-scheduled for the \_\_\_\_\_ day of \_\_\_\_\_, 2007 at \_\_\_\_\_ a.m./p.m.

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The Honorable Gregory M. Sleet  
United States District Court